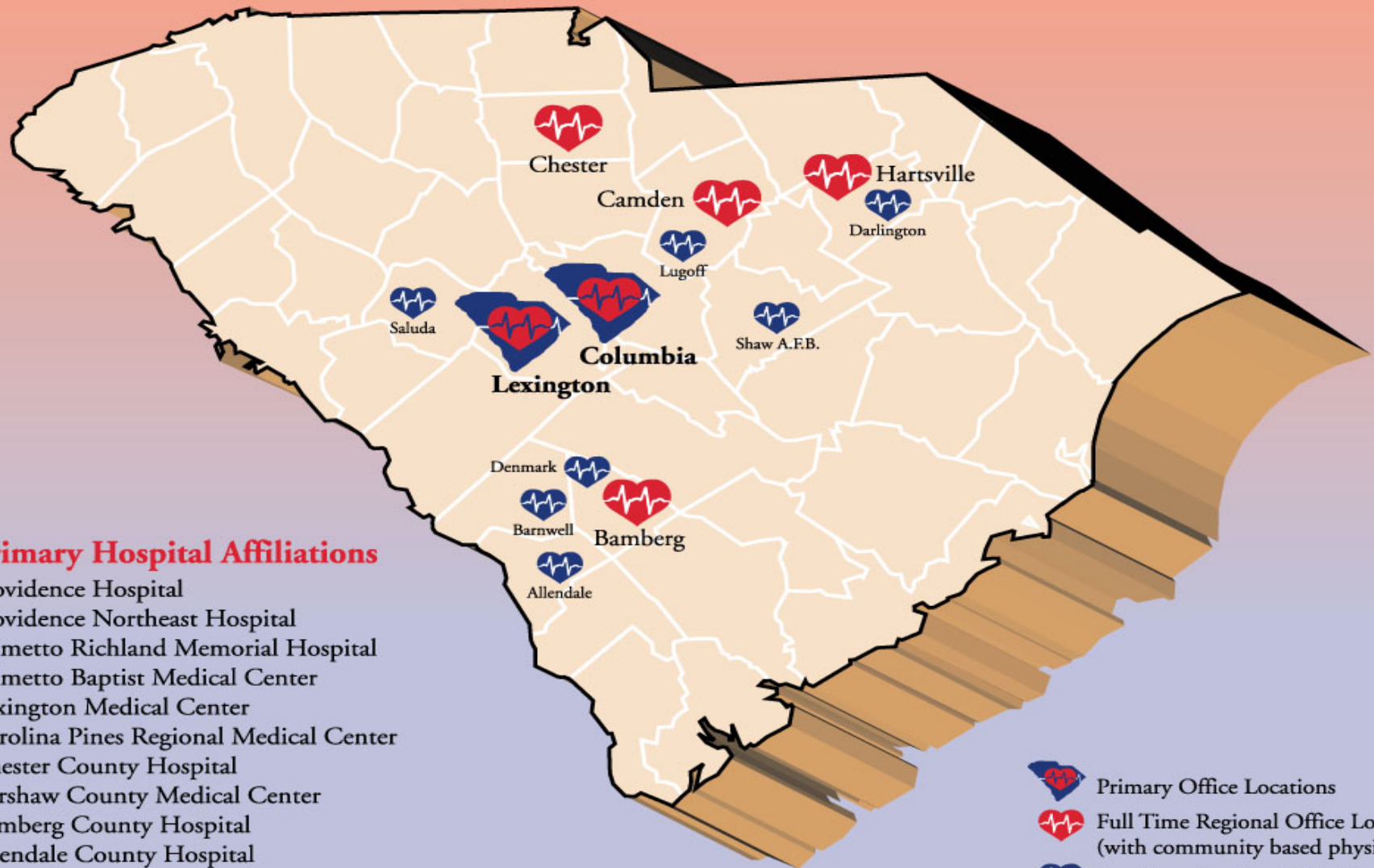


HIPAA for Small Providers

Sherry Shults, RN BSN
Director Clinical Support
South Carolina Heart Center




Providing Advanced Cardiology Care To Patients Throughout South Carolina



Primary Hospital Affiliations

- Providence Hospital
- Providence Northeast Hospital
- Palmetto Richland Memorial Hospital
- Palmetto Baptist Medical Center
- Lexington Medical Center
- Carolina Pines Regional Medical Center
- Chester County Hospital
- Kershaw County Medical Center
- Bamberg County Hospital
- Allendale County Hospital
- Barnwell County Hospital

-  Primary Office Locations
-  Full Time Regional Office Locations
(with community based physicians)
-  Part Time Satellite Office Locations

Total Practice Overview

Provider Staff: 28 Cardiologists & 17 MLPs

290 Employees

3 Outpatient Cath Labs

7 Nuclear Labs

9 Echo/Vascular Labs

1 16-detector MSCT unit

Clinical Research & Physician Education Services

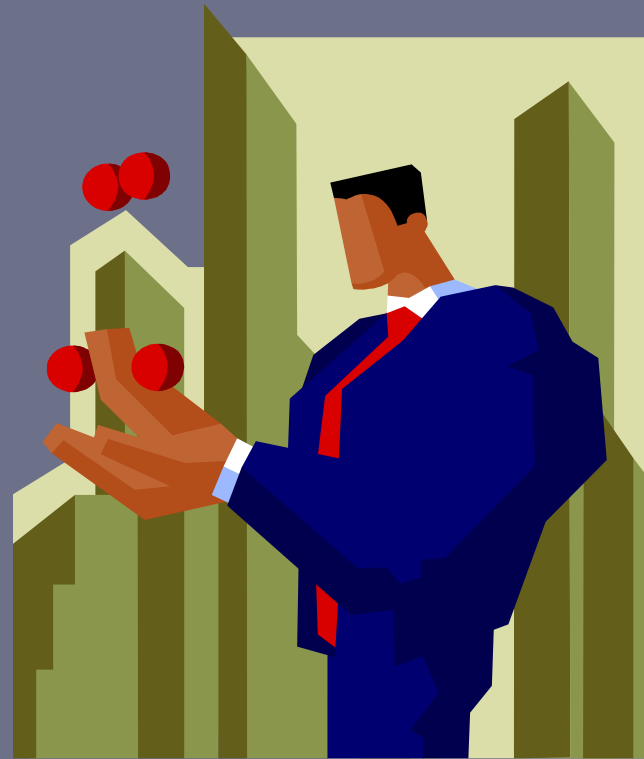
External Counter-Pulsation Services

Preventive Cardiology & Licensed Fitness Center

The Adventure



Limited Funds = No Consultant!!



Resources

- ◆ Federal Register / State Requirements
- ◆ Organizations-AHIMA, HCPro, MGMA, etc.
- ◆ Subscriptions-HIPAA Compliance Alert
- ◆ AHIMA Practice Brief-sample information
- ◆ Web Sites / List Serves
- ◆ Medical Arts Press-forms
- ◆ Vendors-IDX, Siemens, Carolina Copyright



HIPAA Task Force

- ◆ HIMS Supervisor-Spearheaded Privacy Rule
- ◆ Chief Operations Officer
- ◆ Compliance Officer
- ◆ Human Resources
- ◆ Business Office
- ◆ IT Department
- ◆ Office Managers



Gap Analysis

- ◆ Reviewed P & P
- ◆ Mapped flow of PHI
- ◆ Evaluated phone contact/Phone Tree
- ◆ Inventory of Software/Hardware
- ◆ Inventory of Business Associates
- ◆ Reviewed Insurance Policies
- ◆ Facility Walk Through



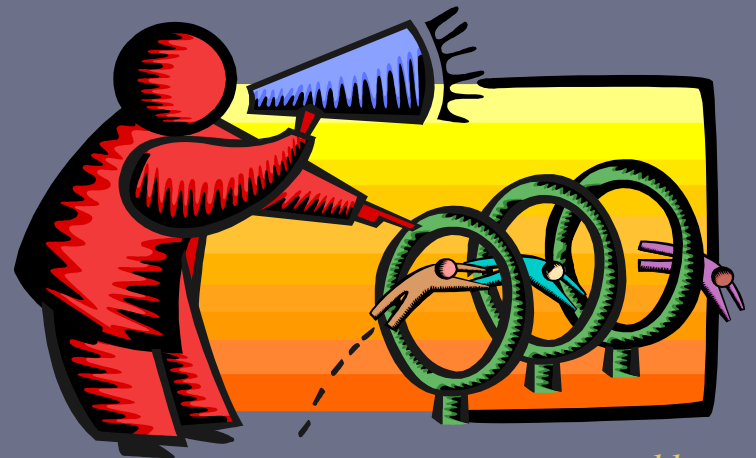
Action Plan

- ◆ Revised P & P
- ◆ Developed Notice of Privacy Practices
- ◆ Revised consents, authorizations, amendments
- ◆ Obtained Business Associate Agreements/Tracked
- ◆ Legal review of all documents
- ◆ Tracking system for accounting of disclosures
- ◆ Implemented structural changes for patient privacy
- ◆ Developed training program



Training

- ◆ Video- “Keep It To Yourself”
- ◆ Brochures- Notice of Information Practices
- ◆ Booklet- “HIPAA Training Handbook for the Physician Office Staff”
- ◆ Security and Confidentiality Agreement
- ◆ Scenario's
- ◆ Q & A



Implementation

- ◆ Utilized Check list
- ◆ Initiated New and Revised P & P
- ◆ Walk Through Inspection
- ◆ Posted Notice of Privacy Practices
- ◆ Distributed Notice of Privacy Practices
- ◆ Documentation in IDX-

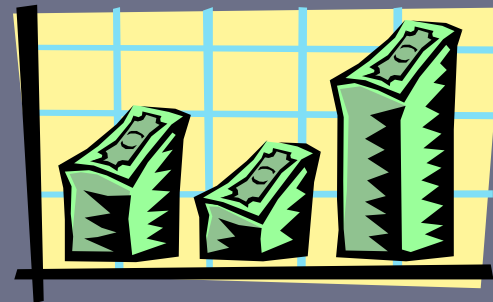
Notice of Information Practices

Names for disclosure-comment field



Challenge of Codes and Transactions

- ◆ Spearheaded by Business Office
- ◆ Utilized Practice Management Vendor-IDX e-commerce paid per provider- ours is over \$3,000/month
- ◆ Staff must know what goes in each field and importance of each field for HCFA 1500 and ANSI formats
- ◆ Requested/Received MD Information Taxonomy Codes
- ◆ Tested System/IDX
- ◆ Went “live” October 1st



Next Adventure-Security

- ◆ Spearheaded by IT Department
- ◆ Reviewed Security P & P
- ◆ Analyzed IT Infrastructure
- ◆ Discussed Individual Security Responsibilities
- ◆ Virus Protection
- ◆ Password Management
- ◆ Monitoring login



